

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 07-20414

v.

HONORABLE PAUL D. BORMAN

D-1 GEOFFREY FIEGER,
D-2 VERNON JOHNSON,

Defendants

_____ /

PROTECTIVE ORDER

THIS MATTER COMING BEFORE THIS COURT on the Joint Motion of the United States and Defendants Geoffrey Fieger and Vernon Johnson for entry of a protective order concerning the disclosure of discovery materials exchanged between the parties in this matter, in light of the financial information and other confidential and sensitive information which may be disclosed in accordance with Fed. R. Crim. P. 16 and other discovery obligations of the parties as provided by law,

IT IS HEREBY ORDERED:

1. Certain items produced in discovery by the parties will be considered “Confidential Material,” which will be treated as described below. This material is defined as follows:

- a. that portion of any materials produced by either party in discovery which contains financial information or personal identifiers such as addresses, social security numbers, and dates of birth.
- b. the entirety of the materials described in the government’s Discovery Notice, filed September 11, 2007 (Docket No. 28) (Discovery Notice) at paragraphs 3(b)(c) and (d) (bank records).
- c. Those portions of the materials described in the Discovery Notice at paragraph 3(e) (Edwards for President Campaign records) which comprise copies of checks

and donor information cards.

This Protective Order shall apply equally to the government and to the Defendants.

2. Confidential Material provided in discovery by the government to the defendants shall be reviewed only by attorneys of record, employees of such attorneys to whom it is necessary that the materials be shown for the purposes of preparation, trial, and appeal of this matter, witnesses or potential witnesses, and experts or consultants assisting in the preparation, trial and appeal of this matter. No additional copies of such materials shall be made except as necessary for the preparation, trial and appeal of this matter. Such witnesses, experts or consultants to whom Confidential Material is disclosed must be served with a copy of this Protective Order prior to disclosures of Confidential Material to them.

3. Confidential Material disclosed by the government shall be used solely for the preparation, trial and direct appeal of this matter and for no other purpose whatsoever. Confidential Material and the contents of the Confidential Material disclosed to the defendants shall not be disclosed to any other individual or entity in any manner other than that authorized by this order, except in Court filings or proceedings, to the photocopy service used by the government or the defendant, or by further order of this Court.

4. Within 60 days from the conclusion of these proceedings and any direct appeal from or collateral attack upon these proceedings, the Confidential Material disclosed by the government and any duplicates made in the preparation, trial and direct appeal of this matter shall be returned to the government, unless the Court gives specific permission for an exception to this requirement.

DATED this 27th day of September, 2007.

s/Paul D. Borman
PAUL D. BORMAN
UNITED STATES DISTRICT JUDGE

Dated: September 27, 2007

CERTIFICATE OF SERVICE

Copies of this Order were served on the attorneys of record by electronic means or U.S. Mail on September 27, 2007.

s/Denise Goodine
Case Manager